

	NPRM Proposed Categories	Bell Atlantic Committed Categories	Comments
<b>PROVISIONING</b>			
	<b>Competing Carriers:</b> <ul style="list-style-type: none"> <li>• Resale Residential POTS               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• Resale Business POTS               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• Resale Specials               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• UNE Loops               <ul style="list-style-type: none"> <li>• W/ interim number portability</li> <li>• W/out INP</li> </ul> </li> <li>• UNE Switching</li> <li>• Combinations of UNEs               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• Interconnection Trunks</li> </ul>	<b>Competing Carriers:</b> <ul style="list-style-type: none"> <li>• Resale POTS               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• Resale Specials               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• UNE POTS               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• UNE Specials               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• Interconnection Trunks</li> </ul>	<p>BA utilizes set intervals based on the nature of the product or "green day" intervals for POTS services with low line size. The same intervals are used whether the end user is a business or a residence customer. Since UNEs are neither business nor residence, there would be no retail analog if retail is separated between business &amp; residence.</p> <p>INP orders are separate from UNE loop orders. For purposes of coordination, the two orders are "related", however from a measurements perspective, BA has no means to relate them for reporting purposes. INP will be no longer available in many jurisdictions with LNP.</p> <p>UNE POTS includes UNE Loop, UNE Switching, INP, and any combination. UNE Specials includes any designed loop, such as a high capacity loop or any UNE combination that includes interoffice facilities, multiplexing or includes 4 wires.</p>
	<b>Incumbent LECs:</b> <ul style="list-style-type: none"> <li>• Retail Residential POTS               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• Retail Business POTS               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• Retail Specials               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> </ul>	<b>Incumbent LECs:</b> <ul style="list-style-type: none"> <li>• Retail POTS               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• Retail Specials               <ul style="list-style-type: none"> <li>• Dispatch</li> <li>• Non-Dispatch</li> </ul> </li> <li>• Feature Group D Trunks</li> </ul>	

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	<b>EXCLUSIONS:</b> <ul style="list-style-type: none"> <li>Cancelled Orders</li> <li>Initial order when supplemented by competing carrier</li> <li>Incumbent LEC orders associated with internal or administrative use of local services</li> </ul>	<ul style="list-style-type: none"> <li>For interval measures, BA excludes "X" dated orders. These are orders where the end user or CLEC requests a due date beyond the standard or offered interval.</li> <li>For missed appointment measures, BA excludes orders where the miss is due to an end user or CLEC delay.</li> </ul>	A supplemental order updates and replaces an original order, therefore an original order would not be included.
	<b>911 Database Update Accuracy</b>		
	<ul style="list-style-type: none"> <li>Competing Carriers</li> <li>ILECs</li> </ul>	<ul style="list-style-type: none"> <li>Not reported</li> </ul>	When BA updates the E911/911 databases on behalf of a CLEC, the orders are processed with BA retail orders. The center that handles "fall-out" or error correction is "blind" to the Carrier.
	<b>Billing</b>		
	<b>Competing Carriers:</b> <ul style="list-style-type: none"> <li>End User Usage Records</li> <li>Access Usage Records</li> <li>Alternately billed usage records</li> <li>Wholesale bill invoices</li> <li>UNE bill invoices</li> </ul> <b>ILECs:</b> <ul style="list-style-type: none"> <li>End User Usage Records</li> <li>Access Usage Records</li> <li>Alternately billed usage records</li> <li>End User Bill Invoices <sup>1</sup></li> </ul>	<b>Competing Carriers:</b> <ul style="list-style-type: none"> <li>Usage Records</li> <li>Wholesale bill invoices</li> </ul> <b>ILECs:</b> <ul style="list-style-type: none"> <li>Nothing reported</li> </ul>	<p>All usage records are captured in the same process and included in the Daily Usage feed. BA measures the timeliness of all records on each tape and accumulates the performance for the month period.</p> <p>BA measures the timeliness of the carrier bill. All CLEC bills are sent via CABs, whether for Resale, UNE or interconnection trunks. BA measures the timeliness of this bill.</p>

<sup>1</sup> While not specified in the NPRM, it requires a measure of average time to deliver invoices for ILECs

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	<b>GENERAL</b>		
	<ul style="list-style-type: none"> <li>• CLECs</li> <li>• ILECs</li> </ul>	<ul style="list-style-type: none"> <li>• CLECs</li> </ul>	BA measures the availability of the single interface that provides access to the downstream OSSs. As long as it is operating, CLECs will have parity of access to downstream OSS's.

	<b>CENTER RESPONSIVENESS</b>		
	<ul style="list-style-type: none"> <li>• CLECs</li> </ul>	Not reported	See Brief.

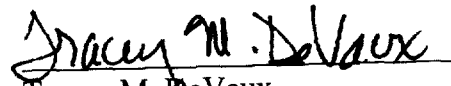
	<b>OS/DA</b>		
	<ul style="list-style-type: none"> <li>• CLECs</li> <li>• ILECs</li> </ul>	Not reported	See Brief.

	<b>TRUNK BLOCKAGE MEASUREMENTS</b>		
	<b>CLECs:</b> <ul style="list-style-type: none"> <li>• Interconnection Trunks</li> <li>• Common Trunks</li> </ul> <b>ILECs:</b> <ul style="list-style-type: none"> <li>• Common Trunks</li> </ul>	<b>CLECs:</b> <ul style="list-style-type: none"> <li>• Interconnection Trunks</li> </ul> <b>ILECs:</b> <ul style="list-style-type: none"> <li>• Common Trunks</li> </ul>	Common trunks carry both BA traffic and CLEC traffic. In some geographic areas, common trunks also carry IXC traffic. It is not possible to report CLEC blockage separately on common trunks that also carry BA local traffic.

	<b>TRUNK BLOCKAGE MEASUREMENTS</b>		
	<b>CLECs:</b> <ul style="list-style-type: none"> <li>• Physical collocation</li> <li>• Virtual Collocation</li> </ul>	<b>CLECs:</b> <ul style="list-style-type: none"> <li>• Physical Collocation</li> </ul>	In the NY pre-filing agreement, BA has committed to reporting physical collocation intervals, excluding those that CLECs request beyond the standard interval or those with CLEC vendor delays.

CERTIFICATE OF SERVICE

I hereby certify that on this 1<sup>st</sup> day of June, 1998 a copy of the foregoing "Comments of the Bell Atlantic Telephone Companies" was served on the parties on the attached list.

  
Tracey M. DeVaux

\* Via hand delivery.

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